

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

JANE DOE,

Plaintiff,

vs.

LIMESTONE UNIVERSITY F/K/A
LIMESTONE COLLEGE, COLLINS MUR-
PHY, MG FREESITES, LTD., d/b/a PORN-
HUB.COM, and HAMMY MEDIA, LTD.
d/b/a XHAMSTER.COM,

Defendants.

Case No.: 7:21-cv-03193-JD

DEFENDANT HAMMY MEDIA, LTD'S
RESPONSES TO LOCAL CIVIL RULE 26.01 DSC INTERROGATORIES

Pursuant to Local Civil Rule 26.01 DSC, Defendant Hammy Media, LTD hereby answers as follows:

(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER: Defendant Hammy Media, LTD is not aware of any at this time.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER: Plaintiff's claims raised in the Amended Complaint (Dkt. #11) should be tried by jury as seeking legal remedies for damages allegedly incurred.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

ANSWER: Defendant Hammy Media, LTD is not a publicly-traded corporation. Defendant Hammy Media, LTD is a privately-owned, foreign company. The remaining inquiry contained within LR26.01 ROG#3 is therefore inapplicable and not answered.

(D) State the basis for asserting the claim in the division in which it was filed.

ANSWER: Defendant Hammy Media, LTD does not believe venue is appropriate in any U.S. Court; however, if there were to be jurisdiction in the District of South Carolina, Spartanburg Division would be appropriate as noted in the Amended Complaint.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER: This action is related to the following matter filed in this District:

- **Does 1-9 v. Murphy et al, Case No.: 7:20-cv-00947-JD. This matter involves some of the same parties, Plaintiff and Defendants. This specific case is still pending.**
- **Arnette et al v. Limestone College et al, Case No.: 7:20-cv-04260-JD. This matter involves some of the same parties, Plaintiff and Defendants. This specific case is still pending.**

(F) If the Defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER: Defendant Hammy Media, LTD is properly identified.

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

ANSWER: Because it is presently unaware of any person or entity that is liable to Plaintiff, Defendant Hammy Media, LTD makes no such contention at this time. Nevertheless, if Defendant Hammy Media, LTD were to be found liable to Plaintiff, Defendant Hammy Media, LTD would seek contribution against Defendant Collins Murphy and/or Limestone College and reserves the right to amend this response if necessary.

Respectfully Submitted,

/s/ Hannah Rogers Metcalfe
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March 3, 2022

Greenville, South Carolina